

City of Tempe
255 E. Marigold Lane
Tempe, AZ 85281



Water Utilities Department

November 30, 2005

Via Fax (702) 293-8156 and Regular Mail

Mr. Robert Johnson
Regional Director
US Bureau of Reclamation
Lower Colorado Region (Attention: BCOO-1000)
PO Box 61470
Boulder City, NV 89006-1470

**Re: Colorado River Reservoir Operations - Development of Lower Basin
Shortage Guidelines and Coordinated Management Strategies for
Lake Powell and Lake Mead Under Low Reservoir Conditions**

Dear Mr. Johnson,

The City of Tempe provides these comments in response to the September 30, 2005, Federal Register notice of intent to prepare an environmental impact statement (EIS) and solicit comments on development of Lower Basin shortage guidelines and coordinated management strategies for Lake Powell and Lake Mead under low reservoir conditions (70 FR 57322).

The City of Tempe provides water service to a population of over 171,000 people in our water service area, in addition to a large concentration of industries, businesses, and educational institutions in the heart of the greater Phoenix metropolitan area. Colorado River water delivered to Tempe via the Central Arizona Project (CAP) is a significant component of Tempe's water resources portfolio. Tempe holds CAP contracts for Municipal & Industrial (M & I) priority water, and lesser amounts of Indian lease water and non-Indian agricultural priority water. Some portions of the Tempe water service area lack rights to use Salt River Project water supplies, such as the adjacent Town of Guadalupe, to which Tempe has provided water service for over 30 years. Colorado River water delivered by the CAP is the single most important water supply to meet the needs of these areas, and Colorado River reservoir operations are fundamental to the CAP supply.

The CAP has a junior priority under the Law of the River. All CAP water users have a significant interest in the management strategies being developed by the U.S. Bureau of Reclamation. The Arizona Department of Water Resources, the CAP, and Colorado River water stakeholders in Arizona have worked together on development of shortage criteria

for total Lower Basin shortages that manage and minimize the impacts to water users from shortage declarations by the Secretary of the Interior. (See Item VI below).

The City of Tempe provides the following comments on the scope of this EIS:

- I. Operation of Lake Powell and Lake Mead must be consistent with the Law of the River.
- II. Operation of the system for water supply purposes has a higher priority than operation of the system for hydropower generation purposes.
- III. Shortage criteria should be implemented for an interim period, with a public process for review and/or revision to the criteria prior to the expiration date. An interim period through 2016 has been suggested, as the Interim Surplus Guidelines also expire that year.
- IV. Mexico and Nevada should share in shortages to the Lower Basin.
- V. Shortage guidelines or management strategies should evaluate the impact to Arizona water users with the Yuma Desalting Plant (YDP) fully operational, and compare impacts to Arizona water users without the YDP in operation.
- VI. The City of Tempe agrees with the Arizona Department of Water Resources recommendation (developed through the stakeholder process) that the EIS should analyze implementation of Lower Basin shortages as follows:
 - For Lake Mead elevation between 1075 ft. and 1050 ft., a shortage reduction of 400,000 acre-feet.
 - For Lake Mead elevation between 1050 ft. and 1025 ft., a shortage reduction of 500,000 acre-feet.
 - For Lake Mead elevation beginning at 1025 ft. and below, a shortage reduction of 600,000 acre-feet.

Thank you for the opportunity to comment on this important Colorado River reservoir management process. We look forward to working with the Bureau of Reclamation, the State of Arizona, the CAP, and other water users as this process moves forward.

Sincerely,



Eric Kamienski
Water Resources Administrator
Tempe Water Utilities Department

cc: Herb Guenther, Director, Arizona Department of Water Resources